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ATTORNEYS FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re)	Chapter 11 Case
MIRANT CORPORATION, et al.,)	Case No. 03-46590-DML-11
Debtors.)	Jointly Administered

AGENDA OF MATTERS SCHEDULED FOR HEARINGS February 15, 2005¹

Matters Set for 9:30 a.m.

A. MOTION TO RESOLVE LEHMAN/WELLS FARGO CLAIMS

Debtors' Expedited Motion for Entry of An Order (i) Specifying Procedures to Resolve Derivative Claims Asserted by Lehman Commercial Paper, Inc. and Wells Fargo Bank Minnesota, N.A. and (ii) Granting Related Relief [Docket No. 8032]

Response Deadline: 02/04/2005 @ 4:00 p.m. Central Time

Status: going forward

Related Documents:

- 1. Motion for Setting and Request for Expedited Hearing [Docket No. 8033]
- 2. Order Regarding Request for Expedited Hearing [Docket No. 8050]

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 $^{^{1}}$ Includes current status of each matter and all pleadings filed as of 9:00 a.m. on February 14, 2005.

- 3. Notice of Hearing [Docket No. 8054]
- Objection to Proofs of Claim Filed by Lehman Commercial Paper Inc. (Claim Nos. 6940-7030) and Wells Fargo Bank Minnesota, N.A. (Claim Nos. 6078-6158) [Docket No. 6272]
- 5. Limited Objection of Wells Fargo Bank, National Association to Debtors' Expedited Motion for Entry of An Order (i) Specifying Procedures to Resolve Derivative Claims Asserted by Lehman Commercial Paper, Inc. and Wells Fargo Bank Minnesota, N.A. and (ii) Granting Related Relief [Docket No. 8185]
- 6. Amended Notice of Hearing [Docket No. 8187]
- 7. Joinder of Lehman Commercial Paper, Inc. in Limited Objection of Wells Fargo Bank, National Association to Debtors' Expedited Motion for Entry of An Order (i) Specifying Procedures to Resolve Derivative Claims Asserted by Lehman Commercial Paper, Inc. and Wells Fargo Bank Minnesota, N.A. and (ii) Granting Related Relief [Docket No. 8189]
- 8. Amended Notice of Hearing [Docket No. 8202]
- 9. Amended Motion to Dismiss Claim Nos. 6940-7030 Filed by Lehman Commercial Paper, Inc. and Claim Nos. 6078-6158 Filed by Wells Fargo Bank Minnesota, N.A. [Docket No. 8205]
- 10. Debtors' Witness and Exhibit List [Docket No. 8256]

Matters Set for 10:30 a.m.

B. TIER III GROUP VI OBJECTIONS TO CLAIMS

Tier III Objection to Certain Proofs of Claim Filed Against the Debtors' Estates (Group VI) Pursuant to 11 U.S.C. §§ 105(a), 502(b), and Rule 3007 of the Federal Rules of Bankruptcy Procedure [Docket No. 6703]

Response Deadline: 12/22/2004 @ 4:00 p.m. Central time

Status: going forward as to claimants (1) Commonwealth of Massachusetts, (2)

Georgia Dept of Revenue, (3) M.W. Schofield, (4) Massachusetts Dept of Revenue, (5) Ohio Dept of Taxation, (6) State of Louisiana, (7) State of Michigan BW & UC Tax Office, (8) State of Ohio, and (9) West

Virginia State Tax Division

Related Documents:

- 1. Notice of Mirant's Objection to Your Proof of Claim (Tier III Group VI) [Docket No. 6704]
- 2. The State of Ohio, Department of Taxation's Response to the Tier III Objection to Certain Proofs of Claims Filed Against the Debtors Estate (Group IV) [sic] Pursuant to 11 U.S.C. § 502(b) and Rule 3007 of the Federal Rules of Bankruptcy Procedure [Docket No. 6950]
- 3. Response of the West Virginia Department of Revenue to Debtor's Objection to Proofs of Claim Dated November 22, 2004 [Docket No. 7310]

- 4. Response of Clark County, Nevada to the Tier III Objection to Certain Proofs of Claim Filed Against the Debtors' Estate (Group VI) Pursuant to 11 U.S.C. §§ 105(a), 502(b), and Rule 3007 of the Federal Rules of Bankruptcy Procedure [Docket No. 7337]
- 5. Response of Fulton County Tax Commissioner to Objection to Fulton County's Proof of Claim in the Amount of \$333,248.80 [Docket No. 7342]
- 6. Louisiana Department of Revenue's Response to Debtor's Objections to Claims [Docket No. 7343]
- 7. Notice of Mirant's Objection to Your Proof of Claim (Tier III Group VI) (only as to New York State Dept of Tax and Finance) [Docket No. 7854]
- 8. Order Granting Tier III Objection to Certain Proofs of Claim Filed Against the Debtors' Estates (Group VI) Pursuant to 11 U.S.C. §§ 105(a), 502(b), and Rule 3007 of the Federal Rules of Bankruptcy Procedure [Docket No. 8034]

C. MOTION TO APPOINT COURT-APPOINTED EXPERT

Perryville Energy Partners, LLC's Motion and Brief in Support of the Appointment of a Court-Appointed Expert Pursuant to Federal Rule of Evidence 706 [Docket No. 8232]

Response Deadline: 02/15/2005

Status: going forward

Related Documents:

1. Motion for Setting and Request for Expedited Hearing [Docket No. 8235]

D. DEBTORS' MOTION FOR PROTECTIVE ORDER (Mirant Mid-Atlantic, LLC, et al v Morgantown OL1 LLC, et al., Adv. No. 04-4283)

Debtors' Expedited Motion for a Protective Order [Adv. Docket No. 96]

Response Deadline: 02/15/2005

Status: going forward

Related Documents:

- 1. Declaration of Douglas P. Baumstein [Adv. Docket No. 97]
- 2. Motion for Setting and Request for Expedited Hearing [Adv. Docket No. 98]
- 3. Order Regarding Request For Expedited Hearing [Adv. Docket No. 100]

E. LESSOR DEFENDANTS' AND TRUSTEE'S MOTION TO COMPEL DISCOVERY (Mirant Mid-Atlantic, LLC, et al v Morgantown OL1 LLC, et al., Adv. No. 04-4283)

Joint Motion of Lessor Defendants and Trustee to Compel Answers to Interrogatories, Requests for Admission, and Requests for Production of Documents [Adv. Docket No. 94]

Response Deadline: 02/15/2005

Status: going forward

Related Documents:

- 1. Joint Motion of Lessor Defendants and Trustee for Setting and for Expedited Hearing [Adv. Docket No. 95]
- 2. Order for Expedited Hearing [Adv. Docket No. 99]

Dated: February 14, 2005

HAYNES AND BOONE, LLP 901 Main Street Suite 3100 Dallas, TX 75202 (214) 651-5000

By: /s/ Ian T. Peck

Robin E. Phelan State Bar No. 15903000 Judith Elkin State Bar No. 06522200 Ian T. Peck State Bar No. 24013306

-and-

Thomas E Lauria State Bar No. 11998025 Michelle C. Campbell State Bar No. 24001828 WHITE & CASE LLP Wachovia Financial Center 200 South Biscayne Blvd. Miami, Florida 33131 (305) 371-2700

ATTORNEYS FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has authorized BSI as service agent to cause to serve a true and correct copy of the foregoing document upon all persons on the Limited Service List, and upon all parties on the attached Service List via email, facsimile and/or overnight courier on the 14th day of February, 2005 in accordance with the Federal Rules of Bankruptcy Procedure.

/s/ Ian T. Peck

SERVICE LIST

PARTIES TO MOTION TO RESOLVE LEHMAN/WELLS FARGO CLAIMS

LEHMAN COMMERCIAL PAPER INC. ATTN: FRANK TURNER, VICE PRESIDENT 745 SEVENTH AVENUE, 19TH FLOOR NEW YORK, NY 10019

WEIL GOTSHAL & MANGES LLP ATTN: PAUL BASTA, ESQ. 767 FIFTH AVENUE NEW YORK, NY 10153

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WEIL GOTSHAL & MANGES LLP ATTN: MARTIN SOSLAND MICHELLE LARSON STEPHEN YOUNGMAN 200 CRESCENT COURT, SUITE 300 DALLAS, TX 75201

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PARTIES TO TIER III GROUP VI OBJECTIONS TO CLAIMS

State of Ohio, Dept of Taxation c/o Lucas C. Ward, Assistant Attorney General] 150 East Gay Street, 21st Floor Columbus, OH 43215 Fax: 614.752.9070

West Virginia State Tax Department Attn: L. Wayne Williams PO Box 766 Charleston, WV 25323-0766 Clark County, Nevada c/o Mark J. Petrocchi Colvin & Petrocchi, L.L.P. 801 Cherry Street, Unit 35, Suite 2485 Fort Worth, TX 76102-6810 Fax: 817.338.9209

Fulton County Tax Commissioner Attn: Office of the County Attorney c/o Rory K. Starkey 141 Pryor Street, S.W. Suite 4038 Atlanta, GA 30303

Louisiana Dept of Revenue Attn: David M. Hansen, Legal Division, 617 North 3rd Street Baton Rouge, LA 70802 Fax: 225.219.2080

Commonwealth of Massachusetts Attn: James B. Dupont Dept of Revenue PO Box 55484 Boston, MA 02205-5484

Commonwealth of Massachusetts Attn: Anne Chan Dept of Revenue PO Box 55484 Boston, MA 02205-5484

Georgia Dept of Revenue Attn: Eunice Nicholson PO Box 161108 Atlanta, GA 30321

Louisiana Dept of Revenue Attn: Cheryl Kees PO Box 66658 Baton Rouge, LA 70896

Massachusetts Div of Employment & Training Attn: Chuck Hurst, Bkcy Analyst Revenue Enforcement Administration 19 Staniford St. Boston, MA 02114-2566 State of Michigan, BW & UC Tax Office Attn: K.K. George POC Unit – Suite 11-500 3024 W Grand Blvd. Detroit, MI 48202

State of Ohio Attn: Rebecca L. Daum Tax Commissioner 30 East Broad Street Columbus, OH 43215

West Virginia State Tax Division Attn: Chrissy Brown PO Box 766 Charleston, WV 25323-0766

M.W. Schofield Attn: Frances McQuarrie Clark County Assessor PO Box 551401 Las Vegas, NV 89155-1401

Massachusetts Dept of Revenue Attn: William F. Connor Litigation Bureau Bankruptcy Unit PO Box 9564 Boston, MA 02114

Massachusetts Dept of Revenue Attn: John Giamettel Litigation Bureau Bankruptcy Unit PO Box 9564 Boston, MA 02114

Ohio Dept of Taxation Attn: Rebecca L. Daum Attorney – Bankruptcy Division 30 E. Broad St. Columbus, OH 43215

State of Louisiana Attn: Cheryl Kees Dept of Revenue PO Box 66658 Baton Rouge, LA 70896

PARTIES TO MOTION TO APPOINT COURT-APPOINTED EXPERT

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